

MONTGOMERY - 09/991,527
Client/Matter: 042503-0259666

REMARKS

Reconsideration and allowance of the above-referenced application are respectfully requested. Upon entry of this amendment, claims 1-25 will be pending.

Applicant notes that claim 1 has been broadened to the extent that the pattern recognition performed using the fourth thread is performed on a pattern that need not be the same pattern used by the second thread. Further, in claim 1 the word "contain" has been changed to "recognize" and the word "processing" to "processed." Neither of these amendments is substantive, and as such should not be considered narrowing. If the Examiner considers these amendments narrowing, he is kindly requested to inform the undersigned of that position.

Claim 1 is rejected under 35 USC 112, second paragraph, as being indefinite. Applicant respectfully traverses the Examiner's rejection.

In particular, the Examiner asserts that the usage of "at least a first thread," "at least a second thread," "at least a third thread," and "at least a fourth thread," is indefinite, further asserting that the word thread does not appear in the descriptive portion of the specification. Both the assertion of indefiniteness, as well as the assertion that the word thread does not appear in the descriptive portion of the specification, are inaccurate. Starting with the latter remark first, at page 10, paragraph 32, the reference to "thread" is used within the sentence

"[C]ertain of the highest priority external patterns are distributed to computers 120 in an uncompressed form for pattern recognition that takes place using another processor thread for the purpose of searching for a particular pattern, as described in U.S. Appln No. bearing attorney reference 042503/0259665 entitled "Method and Apparatus For Determining Patterns Within Adjacent Blocks of Data."

As described here, another processor thread is being used for pattern recognition, which thread is separate from the processor thread that is performing compression. The usage of particular threads in the context of compression is fully discussed in applicant's U.S. Application No. 09/727,066 entitled "Method and Apparatus For Encoding Information Using Multiple Passes and Decoding In a Single Pass," which was incorporated by reference into this application (see

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make this relationship even clearer. From these descriptions, it is readily apparent to one of ordinary skill that certain threads are used for compression, and other threads are used for pattern recognition, in each of the different processing systems. As such, the language in the claim is definite, and fully supported by the specification.

Claim 1 is also rejected under 35 USC 102(b) as being anticipated by Shaw et al. 6,404,928. Applicant traverses the Examiner's grounds of rejection.

Initially, Applicant notes Examiner's position that each of the various different modules or elements are being read on the various threads recited. Applicant respectfully disagrees with this contention. Threads that processors operate upon are well known. Independently separate modules are not threads in any sense. As such, the various modules referred to in Shaw do not properly read on the various threads recited in claim 1, and solely for the reason that modules are not threads, claim 1 is patentably distinct.

Furthermore, the system of Shaw does not provide the functions as recited in claim 1, contrary to the Examiner's assertion. In particular, steps of compressing and performing pattern recognition on two different processor systems, with there being at least two threads on each system: one of the threads performing compression, and the other thread performing pattern recognition, is simply not present, nor are even the functions associated with the threads that are recited.

In particular, there is no teaching or suggestion in Shaw of compressing a stream of digital data using a first thread and performing pattern recognition on that same stream of digital data using a second thread, nor is there any teaching or suggestion in Shaw of further compressing a previously compressed stream of digital data using a third thread and performing pattern recognition on that same stream of digital data using a fourth thread. In fact, even the functions of compressing with one processor system, and then further compressing with another processor system are entirely missing from Shaw. While the switch adjunct 138 and the remote adjunct 138 shown in Figure 6A of Shaw each contain an encoder module 120, there is no teaching or suggestion of using the two different encoder modules 120 in a sequence for compression and further compression. Rather, to the contrary, Shaw teaches at column 11, line 66 to column 12, line 10, that an "encoder (E) 120 and decoder (D) 122" pair will only be needed to facilitate video production and create the image/video data base." As such, respectfully, the assertion made by the Examiner is untenable, and clearly the product of inappropriate hindsight.

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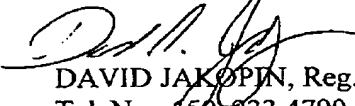
to facilitate video production and create the image/video data base.” As such, respectfully, the assertion made by the Examiner is untenable, and clearly the product of inappropriate hindsight.

Still further, Shaw does not teach or suggest performing pattern recognition using an external pattern of any type. The Examiner refers to a module 182 and that its “motion compensation capabilities include matching motion vectors.... and corresponds to applicant’s pattern recognition since in fact the[y] are recognizing and extracting features of an image/video sequence.” Simply not true. There is no teaching or suggestion of comparing an external pattern with the various patterns within the stream of image data. The motion estimation in Shaw is used solely for old frame to new frame comparisons (see column 18, lines 54-57), and there is no provision, suggestion or teaching of external pattern recognition. Accordingly, the functions of external pattern recognition on the stream of data and the subsequent pattern recognition on the initially compressed stream of data is nowhere taught or suggested by Shaw.

For the above reasons, claim 1 contains allowable subject matter. New claims 2-25 also contain patentable subject matter.

All objections and rejections having been addressed, and in view of the foregoing, the claims are believed to be in form for allowance, and such action is hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, he is kindly requested to contact the undersigned at the telephone number listed below.

Respectfully submitted,
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